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memorandum

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DATE: APR 30 1993

REPLY TO ATTN OF: EM-453.1 (J. Ciocco, 903-7459)

SUBJECT: Comments on the Technical Memorandum Number 1, Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan, Operable Unit 3, April 7, 1993

TO: R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats Branch (EM-453.1), has reviewed the "Technical Memorandum Number 1, Final Phase I Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Work Plan, Operable Unit (OU) 3, April 7, 1993," and is providing the attached comments. Please address these comments during the document finalization process. The draft version of these comments were faxed to Bob Birk on April 16, 1993.

The following are the major comments which have resulted from EM-453.1's review of the referenced document.

1. The need to gather definitive data on resuspension of dust from OU 3 needs discussion. Among the many models available, the simplest is presented in the Risk Assessment Guidance for Superfund (RAGS) Supplement B, 1991, which establishes guidance for determining particulate emission factors (PEF). The need to experimentally determine the PEF is unclear since the value determined by wind tunnel testing will be as uncertain as the default parameters presented in RAGS. At a minimum the equations presented in RAGS should be utilized as a screen to determine if, under the highly conservative assumptions used in the calculations, a risk to human health exists. If the calculation indicates that a risk to human health exists, Rocky Flats may wish to gather analytical data to dispute the conservative assumptions.

2. The data from the existing air monitoring network should be used to determine if there is a need to examine this issue. The monitoring network is providing the information that directly relates to site conditions; if the network indicates that there is not a problem, then an argument can be made that there is no reason to pursue this matter further.

3. A primary use of the wind tunnel results is as input to air transport models. The air transport model that has been proposed for other Rocky Flats OUs, the Fugitive Dust Model, however, does not require as input, the type of data that will be produced by the wind tunnel experiments. The model estimates release rates from surface features and climatological data such as actual measured wind speed distributions. The usefulness of the wind tunnel data for actual modeling needs should be carefully reviewed before committing to this program.

Please contact me at (301) 903-8191, or Jeff Ciocco at 301-903-7459 if you have any questions regarding these comments.

Claire Gesalman

Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
J. Hartman, RF